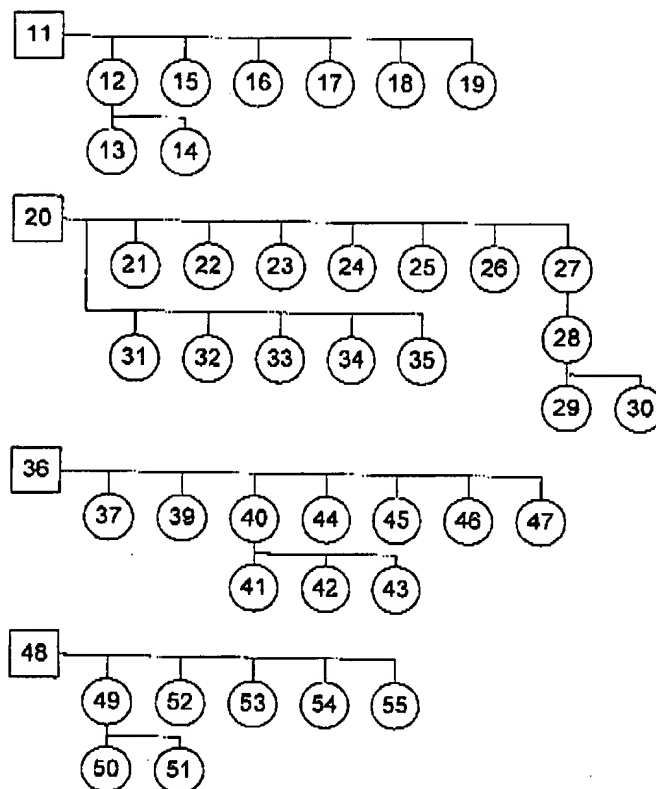


In re Application of CARON et al.  
Application No. 09/504,531

### REMARKS

Reconsideration of the application is respectfully requested. An Office action mailed March 1, 2004 is pending in the application. Applicant has carefully considered the Office action and the references of record. In the Office action, claims 11-57 were rejected under 35 U.S.C. § 103(a) as being unpatentable over combinations of U.S. Patent No. 5,893,911 to Piskiel et al. (hereinafter *Piskiel*), U.S. Patent No. 6,336,139 to Feridun et al. (hereinafter *Feridun*), Gehani et al. "Event Specification in an Active Object-Oriented Database" ACM SIGMOD 1992 (hereinafter *Gehani*), and U.S. Patent No. 5,630,127 to Moore et al. (hereinafter *Moore*). In this response to the Office action, claims 38 and 56-57 have been canceled, and claims 11, 15-16, 20, 25, 27, 30-31, 36, 44, 48-49 and 51-55 have been amended. Therefore, claims 11-37 and 39-55 are pending in the application. The following diagram depicts the relationship between the independent and dependent claims.



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### Rejections of the Independent Claims

Each of the independent claims 11, 20, 36 and 48 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over combinations of *Piskiel*, *Feridun*, *Gehani*, and *Moore*. The Manual of Patent Examining Procedure (M.P.E.P.) states that, to support the rejection of a claim under 35 U.S.C. § 103(a), each claim limitation, that is, as set forth in the words of the claim, must be taught or suggested by the applied prior art.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. ... "All words in a claim must be considered in judging the patentability of that claim against the prior art."

(M.P.E.P. § 2143.03, emphasis added). Each of the independent claims 11, 20, 36 and 48 as amended herein includes at least one limitation not taught or suggested by *Piskiel*, *Feridun*, *Gehani*, or *Moore* alone or in combination and each is thus patentable for at least this reason. Examples of claim limitations not taught or suggested by the applied prior art are given below for each of the independent claims 11, 20, 36 and 48.

#### Independent Claim 11

Independent claim 11 requires a queue associated with an ordered plurality of triggers.

The queue is associated with an ordered plurality of triggers

(claim 11, as amended). Each claimed trigger groups one or more rules.

Each trigger comprises at least one rule, each trigger grouping the at least one rule

(claim 11, as amended). The claimed triggers thus provide for the grouping of the rules in triggers as described in the specification of the present application.

The grouping of the rules in triggers

(page 2 of the specification at line 21). Checking of rules grouped in triggers occurs in the order of the ordered plurality of triggers.

For each trigger associated with the queue, in the order of the ordered plurality of triggers, checking whether the condition specified by the at least one rule of and grouped by the trigger is satisfied by the message

(claim 11, as amended, emphasis added).

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*Piskiel* was cited in the Office action as teaching ordered triggers, but in fact, *Piskiel* teaches that multiple actions may be performed in a desired order.

A sequence field is associated with each action so that multiple actions may be performed in a desired order

(*Piskiel* column 5 lines 3-5, emphasis added). Even if, for the purposes of applying the teachings of *Piskiel* to the claims, the actions of *Piskiel* are said to be the actions of the claims, there are multiple structural differences between the actions of the claims and the triggers of the claims. For example, in claim 11, each trigger comprises at least one rule and each rule specifies a condition and specifies an action.

Each trigger comprises at least one rule, ... each rule, at least, specifies a condition and specifies an action

(claim 11, as amended, see also Figure 4). *Piskiel*, alone or in combination with the prior art of record, is silent with respect to ordered triggers.

#### Independent Claim 20

Independent claim 20 requires that each claimed trigger group a plurality of rules.

Each trigger grouping a plurality of rules in the trigger

(claim 20, as amended). In addition, independent claim 20 requires that each claimed trigger have a switchable enabled/disabled state.

Each trigger having a switchable enabled/disabled state

(claim 20, as amended). Checking of the plurality of rules grouped in each trigger occurs if the switchable enabled/disabled state of the trigger is in the enabled state.

If the switchable enabled/disabled state of the trigger is in the enabled state, check the condition specified by each rule grouped by the trigger

(claim 20, as amended).

*Gehani* was cited in the Office action as teaching a trigger with an enabled state, but, for the purposes of applying the teachings of *Gehani* to the claims, the triggers taught by *Gehani* do not group a plurality of rules in the trigger and, furthermore, do not check the condition specified by each of the plurality of rules grouped by the trigger if the switchable enabled/disabled state of the trigger is in the enabled state, as required, for example, by claim 20. Alone or in combination with the prior art of record, *Gehani* fails

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to teach each of the limitations of the claims that include an enabled/disabled state of the trigger.

Independent Claim 36

Independent claim 36 requires a trigger manager configured to provide for creating, editing and deleting of triggers and rules grouped in triggers in a visual, non-programming manner.

A trigger manager configured to, at least, provide for creating, editing and deleting of triggers and rules grouped in triggers in a visual, non-programming manner (claim 36, as amended). Independent claim 36 also requires that each trigger group at least one rule in the trigger and that each rule specify a condition and an action.

Each trigger grouping at least one rule in the trigger, each rule, at least, specifying a condition and specifying an action (claim 36, as amended).

In the Office action, *Moore* was cited as teaching a trigger manager, but in fact, *Moore* teaches a Global Risk Management System (GRMS).

A Global Risk Management System (GRMS). GRMS is designed to provide financial institutions the functional and system capabilities to support a cross-enterprise view of risk management information.

(*Moore* column 3 lines 40-45). For the purposes of applying the teachings of *Moore* to the claims, the Global Risk Management System of *Moore* is not a trigger manager of the claims. For example, as required by claim 36, *Moore* fails to teach that each trigger groups at least one rule in the trigger and that each rule specifies a condition and an action. Furthermore, *Moore* fails to teach a trigger manager configured to provide for creating, editing and deleting of such triggers and rules grouped in such triggers, and, in particular, for the creating, editing and deleting of such triggers and rules grouped in such triggers in a visual, non-programming manner. Alone or in combination with the prior art of record, *Moore* fails to teach each of the limitations of the claims that include a trigger manager so configured.

Independent Claim 48

Independent claim 48 requires that each claimed trigger group a set of rules.

Each trigger comprises a set of rules, the trigger grouping the set of rules

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(claim 48, as amended). In addition, independent claim 48 requires that the set of rules grouped by each claimed trigger include an ordered set of checked rules that have an order that is independent of non-checked rules.

The set of rules comprises an ordered set of checked rules having an order independent of non-checked rules

(claim 48, as amended, emphasis added). That the ordered set of checked rules have an order that is independent of non-checked rules is significant because steps of independent claim 48 are performed in the order of the ordered set of checked rules grouped by the trigger.

for each checked rule of each trigger associated with the queue, in the order of the ordered set of checked rules grouped by the trigger:

(a) checking if the message satisfies the condition specified by the checked rule; and

(b) if the message does satisfy the condition specified by the checked rule then performing the action specified by the checked rule

(claim 48, as amended, emphasis added).

In the Office action, *Piskiel* was cited as teaching an ordered set of checked rules checked in order. As described above, *Piskiel* teaches that multiple actions may be performed in a desired order, however, *Piskiel* is silent with respect to ordering of checked rules. The Office action indicates the "msg\_id" of *Piskiel* as a checked rule ordering mechanism, but even if, for the purposes of applying the teachings of *Piskiel* to the claims, the rule clauses of *Piskiel* are said to be the rules of the claims, the "msg\_id" of *Piskiel* determines whether the rule clauses of *Piskiel* are ignored rather than determining some ordering of checked rules.

The msg\_id column ... indicates the type of published message to which the rule clause applies. This value uniquely identifies the message type of a published message to which this subscription rule is applied. The rule clause is ignored for any published messages which do not have a msg\_id field value corresponding to the msg\_id field of the rules argument table entry

(*Piskiel* column 8 lines 60-67, emphasis added). Alone or in combination with the prior art of record, *Piskiel* fails to teach each of the limitations of the claims that include an ordered set of checked rules having an order independent of non-checked rules.

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Rejections of the Dependent Claims

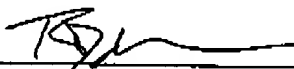
Each of claims 11, 20, 36 and 48 is in independent form, whereas all of the remaining claims depend directly or indirectly on one of these four independent claims. Where the dependent claims are amended, they are amended to bring them into accordance with the independent claim from which they depend and/or to more particularly point out and distinctly claim the invention as described by the specification. In compliance with 37 C.F.R. § 1.121(f), the amendments do not add new matter.

The dependent claims are allowable for at least the same reasons that the four independent claims 11, 20, 36 and 48 are allowable in that the dependent claims incorporate the features of the independent claims. Nevertheless, the dependent claims further define subject matter not shown or rendered obvious by the prior art of record. Because the independent claims are allowable over the applied prior art, applicants do not believe remarks addressing this further subject matter are necessary herein.

CONCLUSION

The application is considered in good and proper form for allowance, and the examiner is respectfully requested to pass this application to issue. If, in the opinion of the examiner, a telephone conference would expedite the prosecution of the subject application, the examiner is invited to call the undersigned attorney.

Respectfully submitted,



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